

**HILL RIVKINS & HAYDEN LLP**

45 Broadway, Suite 1500, New York, NY 10006-3739 Tel: (212) 669-0600

Fax: (212) 669-0698/0699

e-mail: [thefirm@hillrivkins.com](mailto:thefirm@hillrivkins.com)Website: [www.hillrivkinslaw.com](http://www.hillrivkinslaw.com)

April 29, 2008

**Fax Transmission 212-805-6737 (2 pages)**

The Honorable George B. Daniels  
 United States District Judge  
 Southern District of New York  
 United States Courthouse  
 500 Pearl Street  
 New York, New York 10007

**SO ORDERED**

The conference is rescheduled  
 for June 10, 2008 at 9:30 a.m.

*George B. Daniels*  
**HON. GEORGE B. DANIELS**

JUN 10 2008

Re: **Martrade Shipping & Transport GmbH v. Sasco GmbH**  
 Docket No.: 08-cv-01304 (GBD)  
 Our File: 29768-KBD/MDW

Dear Judge Daniels:

We represent plaintiff, Martrade Shipping & Transport GmbH, in this Rule B attachment action in which an initial pre-trial conference is scheduled for May 8, 2008. Plaintiff has attached \$15,000 which remains under restraint at a New York bank pursuant to the Process of Maritime Attachment and Garnishment.

Defendant, a German corporation, was served with the Summons and Complaint pursuant to the Hague Convention on April 11, 2008 and accordingly is to serve its Answer by May 1, 2008. We have not as yet been contacted by any attorneys retained to appear for defendant in this action. If we do not hear from defendant's counsel prior to May 1, 2008, we will be unable to comply with the Court's direction to submit a joint Case Management Plan and Scheduling Order by May 1, 2008, seven (7) days prior to the initial pre-trial conference. Since we have not been contacted by any counsel for defendant although we have sent the notice of the scheduling of the pre-trial conference, we cannot be confident that defendant intends to appoint defense counsel to defend this matter.

Accordingly, we request that the pre-trial conference be adjourned thirty (30) days. If defendant appears in the action, we will discuss and submit a joint Case

NEW JERSEY  
 175 North Broadway  
 South Amboy, NJ 08879-1638  
 Tel: (732) 838-0300 Fax: (732) 316-2363  
 e-mail: [thefirm@hillrivkins.com](mailto:thefirm@hillrivkins.com)

TEXAS  
 712 Main Street, Suite 1515  
 Houston, TX 77002-3209  
 Tel: (713) 222-1515 Fax: (713) 222-1359  
 e-mail: [hillrivkinstexas@hillrivkins.com](mailto:hillrivkinstexas@hillrivkins.com)

CONNECTICUT  
 60 Quarry Dock Road  
 Branford, CT 06405-4654  
 Tel: (203) 315-9274 Fax: (203) 315-9264  
 e-mail: [hillrivkinsct@snet.net](mailto:hillrivkinsct@snet.net)

CALIFORNIA  
 Hill Rivkins/Brown & Associates  
 11140 Fair Oaks Boulevard, Suite 100  
 Fair Oaks, CA 95628-5126  
 Tel: (916) 535-0263 Fax: (916) 535-0268  
 e-mail: [thefirm@brmlaw.com](mailto:thefirm@brmlaw.com)

April 29, 2008

Page 2

Management Plan prior to the adjourned conference date. If defendant does not timely appear, we will submit an application for entry of default judgment.

Respectfully submitted,

HILL RIVKINS & HAYDEN LLP



Michael D. Wilson

MDW:ds

cc: Sasco GmbH  
Hohe Bleichen 5  
20354 Hamburg, Germany  
Attn: Dimitris Nikoloulas – Director

015JudgeDaniels

HILL  
RIVKINS